

# Exhibit 16

**Guzman, Daniel**

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**From:** Munno, M. William  
**Sent:** Wednesday, January 14, 2015 9:51 AM  
**To:** 'rastelloj@midwestloanservices.com'  
**Cc:** 'allen.pfeiffer@duffandphelps.com';  
'Jerald.Dreyer@nationstarmail.com';  
'AScozzafava@WilmingtonTrust.com';  
'Charles.Parekh@duffandphelps.com';  
'Edmond.Esses@duffandphelps.com'; 'kit.weitnauer@alston.com';  
'rpedone@nixonpeabody.com'; 'thomas.musarra@lawdeb.com';  
'timothy.pillar@usbank.com'; 'top@chapman.com';  
'yelena.kaikova@nationstarmail.com'; Guzman, Daniel; Munno, M. William  
**Subject:** RMBS Trustees Request for Covered Loans in the Covered Trusts:  
In re Lehman Brothers Holdings Inc. - Case No. 08-13555  
**Attachments:** Midwest Population 1.7.2015.xlsx; Trustee Direction Letter.pdf;  
Order re Protocol dated Dec. 29, 2014.pdf  
**Importance:** High

Dear Mr. Rastello:

Could you please let us know by January 16 when the requested loan files can be delivered? Time is of the essence. We are facing Court deadlines to retrieve the loan files. We are available to discuss any issues. We attach the Court Order and Court-ordered Protocol under which the RMBS Trustees are operating.

We note that during the hearing on December 10, 2014, Judge Chapman emphasized “the ability of the Court to assist in obtaining the documents.” Tr. at 340:3-4. Judge Chapman noted that when parties call “people respond with more or less urgency,” but “it’s another thing when the Court gets involved” (*id.* at 340:6-8) “backed up by the ability of the Court to order parties to [pro]duce documents.” *Id.* at 357:22-23. “The files have to move.” *Id.* at 350: 25.

On December 29, 2014, the Court entered an order specifying (at 5):

ORDERED that the RMBS Trustees shall promptly request and seek applicable documents and records from the master servicers with respect to the Covered Loans; and it is further

ORDERED that the primary and master servicers for the Covered Loans from whom the RMBS Trustees and the Plan Administrator seek applicable documents and records in connection with the implementation of the RMBS Protocol shall promptly respond to the RMBS Trustees' and the Plan Administrator's reasonable document and file requests; and it is further

The court-ordered Protocol also specified (at section I(e)):

e. If any or all of the primary servicers are not promptly providing the requested files, the RMBS Trustees shall promptly request that the Bankruptcy Court order the production of the files. The Plan Administrator shall reasonably cooperate with and support such request.

Accordingly, please let us know by January 16, 2015, when the loan files can be provided.

Thank you.

M. William Munno

Enclosure: Order and Ordered Protocol

**From:** [Jerald.Dreyer@nationstarmail.com](mailto:Jerald.Dreyer@nationstarmail.com) [<mailto:Jerald.Dreyer@nationstarmail.com>]  
**Sent:** Wednesday, January 07, 2015 7:23 PM  
**To:** [rastelloj@midwestloanservices.com](mailto:rastelloj@midwestloanservices.com)  
**Cc:** 'allen.pfeiffer@duffandphelps.com'; 'AScozzafava@WilmingtonTrust.com'; Parekh, Charles; 'Edmond.Esses@duffandphelps.com'; Guzman, Daniel; 'kit.weitnauer@alston.com'; 'rpedone@nixonpeabody.com'; 'thomas.musarra@lawdeb.com'; 'timothy.pillar@usbank.com'; 'top@chapman.com'; 'yelena.kaikova@nationstarmail.com'; Munno, M. William  
**Subject:** Trustee Request

Jon,

Please see the attached Direction Letter from US Bank National Association, Law Debenture Trustee Company of New York, Wilmington Trust Company, Wilmington Trust National Association and Deutsche Bank National Trust Company (referred to as the "Trustee Group" in this e-mail). Nationstar, as Master